

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No.:

-----X
JULLIE M. MENDEZ,

Plaintiff,

-against-

DAVID RHONEY and ELECTRO MECHANICAL
TECHNOLOGIES, INC.,

Defendants.
-----X

SUMMONS

Plaintiff designates Bronx County
as the place of trial.

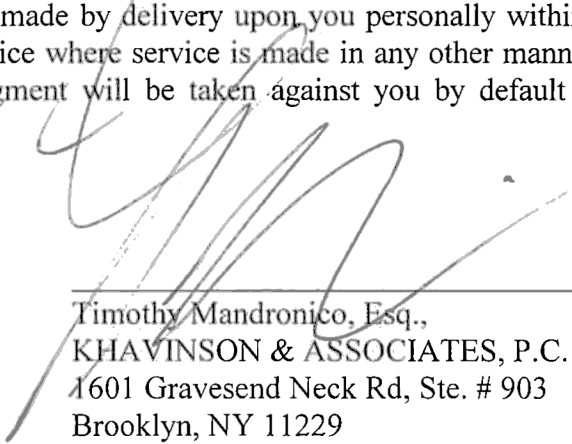
The basis of venue is:
Plaintiff's residence

Plaintiff resides at:
1683 Boston Rd, Apt#4E
Bronx, NY 10460

To the above named Defendants

YOU ARE HEREBY SUMMONED to answer the Complaint in this action, and to serve a copy of your Answer, or if the Complaint is not served with this Summons, to serve a Notice of Appearance on Plaintiff's attorneys within twenty days after the services of this Summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

DATED: Brooklyn, New York
August 22, 2019



Timothy Mandronico, Esq.,
KHAVINSON & ASSOCIATES, P.C.
1601 Gravesend Neck Rd, Ste. # 903
Brooklyn, NY 11229
T: (718) 421-3815
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To:
DAVID RHONEY-530 Park Avenue, Orange, NJ 07050
ELECTRO MECHANICAL TECHNOLOGIES, INC-676 Ramsey Avenue, Hillside, NJ 07205

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
JULLIE M. MENDEZ,

Plaintiff,

VERIFIED COMPLAINT

-against-

Index No.:

DAVID RHONEY and ELECTRO MECHANICAL
TECHNOLOGIES, INC.,

Defendants.

-----X
Plaintiff, **JULLIE MENDEZ**, by her attorneys, **KHAVINSON & ASSOCIATES, P.C.**,

as and for a cause of action alleges upon information and belief as follows:

1. At all times mentioned herein, Plaintiff, **JULLIE M. MENDEZ**, was and is still a resident of the State of New York, Bronx County.
2. At all times mentioned herein, Plaintiff, **JULLIE M. MENDEZ**, was and is over the age of 18 years old.
3. That on March 8, 2019, at or about 10:19 AM, Plaintiff, **JULLIE M. MENDEZ**, was the restrained operator of a 2002 DODGE SUV, bearing New York State license plate number HSS1976, traveling at or near 1500 Boston Rd, County of Bronx, State of New York.
4. At all times mentioned herein, Defendant, **DAVID RHONEY**, was and is still a resident of the State of New Jersey, City of Orange.
5. At all times mentioned herein, Defendant, **DAVID RHONEY**, was and is over the age of 18 years old.
6. That on March 8, 2019, at or about 10:19 AM, Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**, was and is a foreign business corporation registered with the State of New Jersey.

7. That on March 8, 2019, at or about 10:19 AM, Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**, was and is a foreign business corporation registered with the State of New Jersey, with its Principal Place of Business at 676 Ramsey Avenue, Hillside NJ 07205.

8. That on March 8, 2019, at or about 10:19 AM, Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**, was the registered owner of a 2018 FORD Tractor Truck Diesel.

9. That on March 8, 2019, at or about 10:19 AM, Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**, was the registered owner of a 2018 FORD Tractor Truck Diesel, bearing New Jersey State license plate number XCSA85.

10. That on March 8, 2019, at or about 10:19 AM, Defendant, **DAVID RHONEY**, was the operator of a 2018 FORD Tractor Truck Diesel.

11. That on March 8, 2019, at or about 10:19 AM, Defendant, **DAVID RHONEY**, was the operator of a 2018 FORD Tractor Truck Diesel, bearing New Jersey State license plate number XCSA85.

12. That on March 8, 2019, at or about 10:19 AM, Defendant, **DAVID RHONEY**, was the operator of a 2018 FORD Tractor Truck Diesel, with the permission and consent of its owner, Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**

13. That on March 8, 2019, at or about 10:19 AM, Defendant, **DAVID RHONEY**, was an employee of Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**

14. That on March 8, 2019, at or about 10:19 AM, Defendant, **DAVID RHONEY**, was operating a 2018 FORD Tractor Truck Diesel while in the scope of his employment with Defendant, **ELECTRO MECHANICAL TECHNOLOGIES, INC.**

15. That on March 8, 2019, at or about 10:19 AM, there was a two-vehicle collision involving the vehicle operated by Defendant, **DAVID RHONEY**, and the vehicle operated by

Plaintiff, **JULLIE M. MENDEZ**, at or near 1500 Boston Rd, County of Bronx, State of New York.

16. That said collision occurred when the vehicle operated by Defendant, **DAVID RHONEY**, collided with the vehicle operated by Plaintiff, **JULLIE M. MENDEZ**.

17. That Defendant, **DAVID RHONEY**, violated the New York Vehicle and Traffic Laws, as well as the Rules of the City of New York.

18. That Defendant, **DAVID RHONEY**, failed to use reasonable care under the circumstances in order to avoid the subject collision, thereby solely causing the collision.

19. That as a result of the said collision, all of the involved motor vehicles sustained vehicular damage.

AS AND FOR A FIRST CAUSE OF ACTION FOR PLAINTIFF JULLIE M. MENDEZ

20. Plaintiff, **JULLIE M. MENDEZ**, repeats and re-alleges all the allegations contained in paragraphs 1-19 above as if set forth fully.

21. That the aforesaid collision described in paragraphs above was solely caused by Defendant's negligence.

22. That the aforesaid collision described in paragraphs above was solely caused by Defendant's recklessness.

23. That Plaintiff, **JULLIE M. MENDEZ**, shares no comparative fault and displayed no want of care for the subject collision.

24. That as a direct result of Defendant's negligence and/or recklessness, Plaintiff, **JULLIE M. MENDEZ**, was rendered sick, lame, unable to work, suffered mental anguish, emotional distress, pain and suffering, and loss of enjoyment in her life.

25. That Plaintiff, **JULLIE M. MENDEZ**, was seriously and permanently injured under

New York Insurance Law § 5102(d) solely as a result of Defendant's negligence and/or recklessness.

26. That Plaintiff, **JULLIE M. MENDEZ**, will require in the future medical attention for the rest of her life as a result of her aforesaid serious and permanent injuries.

27. That as a direct result of Defendant's negligence and/or recklessness, Plaintiff, **JULLIE M. MENDEZ**, sustained economic damages in excess of basic economic loss under New York Insurance Law § 5104.

28. That by reason of the foregoing, Plaintiff, **JULLIE M. MENDEZ**, has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

29. That this action falls under one or more of the exceptions of Article 1602 of New York's CPLR.

WHEREFORE, Plaintiff, **JULLIE M. MENDEZ**, demands judgment against the above-named Defendants collectively and individually in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction, together with costs and disbursements of this action, and such other and further relief that this Court deems just and proper.

DATED: Brooklyn, New York
August 22, 2019

Yours, etc.

Timothy Mandronico, Esq.,
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1601 Gravesend Neck Rd, Ste. # 903
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F: (718) 421-3925

ATTORNEY VERIFICATION

State of New York }
 } SS:
County of Kings }

I, Timothy Mandronico, Esq., Esq., the undersigned, an attorney admitted to practice in the courts of the State of New York, and associated with the law firm of **KHAVINSON & ASSOCIATES, P.C.**, state that **KHAVINSON & ASSOCIATES, P.C.** are the attorneys of record for Plaintiff **JULLIE M. MENDEZ** in the within action. I have read the foregoing **SUMMONS AND VERIFIED COMPLAINT** in the within action and know the contents thereof, the same are true to my knowledge except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. The reason this verification is made by the undersigned attorney and not by the Plaintiff is that Plaintiff reside(s) in a county other than which this law office maintains its offices.

The grounds of my belief as to those matters therein not stated upon knowledge is based upon facts, records, and other pertinent information contained in our legal files maintained in the ordinary course of business.

DATED: Brooklyn, New York
August 22, 2019



TIMOTHY MANDRONICO, ESQ.,

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

JULLIE M. MENDEZ,

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DAVID RHONEY and ELECTRO MECHANICAL TECHNOLOGIES, INC.,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

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Attorneys for Plaintiff

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